

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PROVIDENCE STEEL, INC., individually)
and on behalf of a class of persons similarly)
situated,)

Plaintiff,)

v.)

THE UNION CENTRAL LIFE)
INSURANCE COMPANY,)

Defendant.)

CIVIL ACTION NO: 04-10440-NG

AFFIDAVIT OF S. DAVID MCNEILL

I, S. David McNeill, under the penalties of perjury, hereby affirm that the following is true and correct, upon my knowledge, information and belief.

1. The above-captioned matter involves allegations that the defendant, The Union Life Insurance Company ("Union Central"), has overcharged the plaintiff and a similarly situated class for group insurance policy premiums.

2. I have maintained an attorney/client relationship with Union Central for many years. Union Central has requested that I represent it in this action.

3. I practice law principally in the State of Michigan.

4. I am a member in good standing of the Bar of the State of Michigan, having been admitted in 1972.

5. I am a member in good standing for the United States District Court for the Eastern District of Michigan.

6. There are no outstanding disciplinary matters concerning my admission, standing and/or licensure in any of the aforementioned jurisdictions.


7. There are no other cases in this district for which I am currently admitted to practice before this Court.

8. I am familiar with the Federal Rules of Civil Procedure and applicable Local Rules of the Federal District Court for the District of Massachusetts and agree to observe and be bound by said Local Rules and Orders of this Court.

9. I recognize and affirm that I will abide by the disciplinary rules applicable to all attorneys who are admitted to the Bar of this Court.

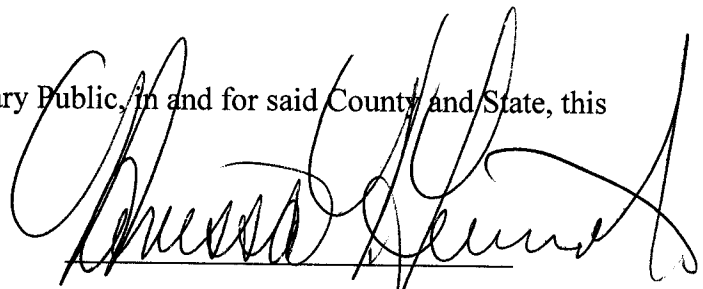
FURTHER, AFFIANT SAYETH NOT.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 11th DAY OF March, 2004


s/David McNeill
S. David McNeill

STATE OF MICHIGAN)
)SS
COUNTY OF OAKLAND)

11th day of March, 2004 Subscribed and sworn before me, a Notary Public, in and for said County and State, this



VANESSA V. FERRIS
Notary Public, Wayne County, MI
My Commission Expires Dec. 20, 2007
acting in Oakland